

## AFFIDAVIT OF MERIT

Vineland 820 N. Main Road, LLC  
Plaintiff,  
Vs.

UNITED STATES DISTRICT COURT  
CAMDEN COUNTY  
CASE NO: 1:17-CV-02986-NLH-JS

United States Liability Insurance Company,  
United States Liability Insurance Group,  
Biondi Insurance Agency, Inc. and  
Steven Tramontana

Defendant(s).

### Affidavit of Merit

I, BENJAMIN F. CLOUD, of full age, being duly sworn according to law, upon his oath, deposes and says:

1. I am a licensed Agent-Broker and practice as a consultant in the State of Delaware and elsewhere. I hold the following designations: CPCU, CRM, RALU, CIC.
2. I have been practicing for over 50 years. My area of expertise is Property Casualty Insurance, Workers Compensation and Resolution of Claims problems, as my enclosed resume will confirm. (See enclosed my *curriculum vitae - CV*).
3. I have no financial interest in the outcome of this case.
4. Based on the records which I have had the opportunity to review and/or the facts of this matter, it is my opinion premised on my experience, skill and knowledge, that the present complaint as brought before the court by the Plaintiff, Vineland 820 N. Main Road, LLC, it is meritorious.
5. That in so pursing there is a reasonable probability that the care, skill or knowledge exercised or exhibited in the handling of *insurance issue at hand* fell outside acceptable *professional standards reasonably expected* by insured of the individuals in charge of such matters.
6. The above is not intended to be my entire opinion in this matter or my entire curriculum vitae (CV). The above is merely intended to be certain minimal information as required by the Affidavit of Merit Statute and has been prepared by counsel for the plaintiff.

I HEREBY CERTIFY that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

Dated:

Sworn to and subscribed before me  
this 30<sup>th</sup> day October, 2017  
Laurie A. Dunfee  
Notary Public  
State of  
My Commission Expires: 4-28-2018

  
BENJAMIN F. CLOUD